



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

September 25, 2023

**BY ECF**

The Honorable Denise L. Cote  
United States District Judge  
Southern District of New York  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

*Gov. Seal.*  
*J. Williams*  
*10/3/23*

**Re: United States v. Laura Perryman, 23 Cr. 117 (DLC)**

Dear Judge Cote:

We write to request permission to seal Exhibit A to the Government's memorandum of law in opposition to the defendant's motion to dismiss the indictment and for a bill of particulars, which was filed on September 25, 2023, *see* ECF No. 37-1. In the course of filing its memorandum of law, the Government inadvertently uploaded, as an exhibit, an e-mail communication thread among the defendant and third parties with incomplete redactions of third-party personal identifiable information, *see* ECF No. 37-1. We therefore seek permission to seal ECF No. 37-1, and to replace it with a version of the document with redactions of all third-party personal identifiable information. (Pursuant to Section 21.8 of the SDNY Electronic Case Filing Rules & Instructions, ECF No. 37-1 has been temporarily sealed pending this Court's order.) We apologize for filing the exhibit with incomplete redactions. Counsel for the defendant does not object to this request.

We thank the Court for its consideration of this request.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

By: /s/ Mónica Folch  
Jacob M. Bergman  
Mónica P. Folch  
Steven J. Kochevar  
Assistant United States Attorneys  
(212) 637- 2776/6559/2262

cc: Counsel for Ms. Perryman by ECF